

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FEDERICO VILLEGAS-RIVAS,
RYAN EHRLICHER, FERNANDO
ANGEL, LUIS GALVAN, DANIEL
CARDENAS, and GERARDO
HERNANDEZ, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

ODEBRECHT CONSTRUCTION, INC.,
AND ZACHRY CONSTRUCTION
CORPORATION,

Defendants.

Civil Action No.
4:18-cv-01181

**DEFENDANTS' CORPORATE DISCLOSURE
STATEMENT AND CERTIFICATE OF INTERESTED PARTIES**

Defendants Odebrecht Construction, Inc. ("Odebrecht") and Zachry Construction Corporation ("Zachry") hereby file their Corporate Disclosure Statement and Certificate of Interested Parties in accordance with Rule 7.1 of the Federal Rules of Civil Procedure and the Court's Order for Conference and Disclosure of Interested Parties (Dkt. No. 4), as follows:

1. Odebrecht Construction, Inc. is a wholly-owned subsidiary of Odebrecht Engenharia e Construcao Internacional SA. No publicly held corporation owns any of Odebrecht Construction, Inc.'s stock.

2. Zachry Construction Corporation is a wholly-owned subsidiary of H.B. Zachry Company, LLC. No publicly held corporation owns any of Zachry Construction Corporation's stock.

3. Persons financially interested in this litigation are:

- a. Odebrecht Construction, Inc., Defendant
- b. Zachry Construction Corporation, Defendant
- c. Odebrecht Engenharia e Construcao Internacional SA
- d. H.B. Zachry Company, LLC
- e. Federico Villegas-Rivas, Plaintiff
- f. Ryan Ehrlicher, Plaintiff
- g. Fernando Angel, Plaintiff
- h. Luis Galvan, Plaintiff
- i. Daniel Cardenas, Plaintiff
- j. Gerardo Hernandez, Plaintiff
- h. All other persons and entities listed on Plaintiffs' Certificate of Interested Parties.

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Respectfully submitted this 12th day of June, 2018.

/s/ Patricia G. Griffith

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2018, a true and correct copy of the above and foregoing instrument was served upon counsel of record referenced below via the Court's notice of electronic filing service:

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/s/ Patricia G. Griffith
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